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April 27, 2021

By ECF and Email

Honorable P. Kevin Castel
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: United States v. Vance Collins and Ramon Ramirez
19 Cr. 395 (PKC)

Dear Judge Castel,

Defendants Vance Collins and Ramon Ramirez are scheduled to be sentenced on May 12, 2021. Pursuant to this Court's Individual Rules of Practice for Sentencing Proceedings, defense sentencing submissions, if any, are due two weeks prior to sentencing (here, April 28, 2021). Both defense teams are working diligently to complete their sentencing submissions. However, due to delays caused by the COVID-19 pandemic, the job is being made slightly more difficult than usual. Accordingly, both Mr. Collins and Mr. Ramirez respectfully request that they be permitted to file their respective submissions by this Friday, April 30, 2021, rather than tomorrow.

A.U.S.A. Adam Hobson has kindly consented to this request.

Thank you.

Respectfully Submitted,

/s/ *Matthew J. Kluger*
Matthew J. Kluger
Jodi L. Morales
Attorneys for Ramon Ramirez

/s/ *Eric Breslin*
Eric R. Breslin
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cc: AUSA Frank Balsamello
AUSA Jamie Bagliebter
AUSA Adam Hobson